

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY

Plaintiff,

-against-

MICROSOFT CORPORATION, *et al.*,

Defendants.

No. 1:23-cv-11195-SHS-OTW

**AFFIDAVIT OF EVANGELINE A.Z.  
BURBIDGE IN SUPPORT OF MOTION  
TO ADMIT COUNSEL *PRO HAC VICE***

DAILY NEWS, *et al.*,

Plaintiff,

-against-

MICROSOFT CORPORATION, *et al.*,

Defendants.

No. 1:24-cv-03285-SHS-OTW

THE CENTER FOR INVESTIGATIVE  
REPORTING, INC.,

Plaintiff,

-against-

OPENAI, INC., *et al.*,

Defendants.

No. 1:24-cv-04872-SHS-OTW

I, Evangeline A.Z. Burbidge, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am a partner of the law firm of Lewis Llewellyn LLP, and I am counsel for Defendants OpenAI Inc., OpenAI LP, OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, and OpenAI Holdings LLC (collectively, “OpenAI”) in the above-captioned matter.

2. I respectfully submit this declaration in support of my Motion to Admit Counsel *Pro Hac Vice* (“Motion”).

3. I am a member in good standing of the Bar of California and was admitted on December 14, 2016.

4. I am a member in good standing of the Bar of Utah and was admitted on May 14, 2019.

5. I attach a certificate of good standing from the Supreme Court of California, which was issued within thirty days of this filing, as Exhibit A to my Motion.

6. I attach a certificate of good standing from the Supreme Court of Utah, which was issued within thirty days of this filing, as Exhibit B to my Motion.

7. I have never been convicted of a felony or been the subject of any criminal conviction.

8. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

9. I have never been the subject of a disciplinary sanction and there are no disciplinary proceedings presently pending against me.

Wherefore your declarant respectfully submits that she be permitted to appear as counsel pro hac vice in this case on behalf of OpenAI.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 30, 2025

State of Texas

County of Tarrant

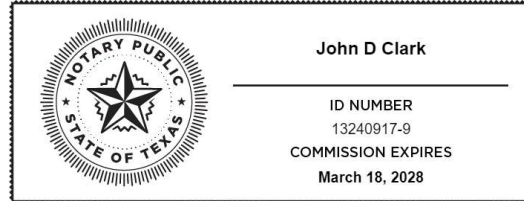
Sworn and subscribed to before  
me this 30<sup>th</sup> day of January, 2025  
by Evangeline Zimmerman Burbidge.

Notary Public, State of Texas

  
Notary Public



Evangeline A.Z. Burbidge



Electronically signed and notarized online using the Proof platform.